

From: [Cox, Michael](#)
To: [Kelly, Joyce](#); [Fleming, Sheila](#)
Cc: [Cox, Michael](#)
Subject: Yakima: Peer Review
Date: Wednesday, March 13, 2013 3:14:06 PM

Joyce: Were you able to talk with Ed today? I was thinking it would make sense to talk with Ed prior to sending to Glen in case Ed had any concerns. If you have already done that they no problem

Several commenters indicated the peer review conducted for the EPA 2012 Report was inadequate because: 1) EPA did not follow its own peer review guidance; 2) that the EPA 2012 Report was classified as “influential” by Office of Management and Budget (OMB) and required more extensive review; 3) EPA’s selection of peer reviewers was not transparent and all four peer reviewers were from federal agencies; 4) with the exception of one reviewer the comments received were brief and not adequately rigorous; and 5) one peer reviewer stated that the nitrate in many of the wells is most likely from a mix of sources which would be challenging to tease apart, probably requiring a much more extensive sampling campaign and more knowledge of well depth and screen lengths.

EPA’s response: Agency guidance provides several options for the peer review of documents classified as “Influential” under the OMB work product criteria. Consistent with Agency Peer Review Guidance, EPA utilized an external peer review approach, which included scientists from USGS, and the U.S. Department of Agriculture. In addition, scientists from EPA’s Office and Research and Development and EPA Region 10 conducted internal peer review. EPA considered the peer reviewers’ comments on the EPA 2012 Report and revised the report in response to the comments. The independent peer review process helped EPA solidify its conclusions and clarify the limitations and uncertainties of the study.

Brief comments do not necessarily imply a lack of rigor; brief comments could have resulted from a rigorous review in which the reviewer found the EPA 2012 Report’s conclusions to be well supported by data. As noted in previous responses above, EPA’s conclusions do not preclude the possibility of multiple sources of nitrate. This possibility does not negate or diminish the conclusions that were stated in the EPA 2012 Report.

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